



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

February 9, 2017

CERTIFIED MAIL

Mr. Paul Travis
Farm to Market Specialties
P.O. Box 282
Hicksville, Ohio 43526

**Re: Farm to Market Specialties
Notice of Violation (NOV)
Air Permit
Defiance County
0320002003**

And

Mr. William Cleland
5-C's Drying, LLC
9960 Rosedale Road
Hicksville, Ohio 43526

Subject: Notice of Violation

Dear Mr. Travis and Mr. Cleland:

On November 10 and 11, 2016, Farm to Market Specialties (formerly known as 5-C's Drying, LLC) performed emissions testing on the Biofuel-Fired Dryer, emissions unit P902. The testing was required through Final Findings and Orders issued October 13, 2016, and were conducted in conformance with Ohio EPA methods and procedures. The emissions test was performed to demonstrate compliance with the allowable emissions rates for nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), and particulate matter less than 10 microns in diameter (PM₁₀). The allowable emission rates are outlined in the terms and conditions of permit-to-install and operate (PTIO) P0111913.

Findings

Based on a review of the emissions test results, Ohio EPA has determined that emissions unit P902 is not in compliance with the permitted allowable emissions limitations for PM₁₀, NO_x, CO or VOC. In order to bring your facility into compliance, we recommend promptly addressing these violations within the timeframes outlined in this letter.

1. Ohio Revised Code (ORC) 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

The terms and conditions of PTIO P0111913 establish pollutant emissions limitations of 2.30 lbs/hr for PM₁₀, 6.0 lbs/hr for NO_x, 4.0 lbs/hr for CO, and 7.80 lbs/hr for VOC.

- (a) The emissions test performed November 10-11, 2016, identified the measured emissions rates as follows:

PM₁₀

Run #1 – 10.22 lbs/hr
Run #2 – 10.54 lbs/hr
Run #3 – 11.08 lbs/hr
Average – 10.61 lbs/hr

NO_x

Run #1 – 10.13 lbs/hr
Run #2 – 10.88 lbs/hr
Run #3 – 10.21 lbs/hr
Average – 10.41 lbs/hr

CO

Run #1 – 11.75 lbs/hr
Run #2 – 6.78 lbs/hr
Run #3 – 4.82 lbs/hr
Average – 7.79 lbs/hr

VOC

Run #1 – 136.17 lbs/hr
Run #2 – 92.82 lbs/hr
Run #3 – 97.53 lbs/hr
Average – 108.84 lbs/hr

Exceedances of the pollutant emissions limitations, as identified above, are considered violations of the terms and conditions 2.b)(1)a. of PTIO P0111913 and Ohio Revised Code (ORC) 3704.05(C).

(b) *Requested action:*

Within 30 days of receipt of this letter, Farm to Market Specialties shall submit a compliance plan to Ohio EPA which includes a retest to verify compliance after a switch to non-manmade hardwood sawdust. The compliance plan shall address how the facility will resolve the emissions violations identified above.

2. ORC 3704.03 and 3745.01: *"Issue... orders requiring abatement of or prohibiting emissions that violate applicable emission standards... or requiring emission control devices or measures in order to comply with applicable emission standards or other requirements of this chapter and the rules adopted thereunder."*

Final Findings and Orders journalized October 14, 2016, Order 6. states:
Within ninety (90) days of the effective date of these Orders, Respondent shall submit to Ohio EPA, a revised and complete permit application for EU P902 that accurately reflects the operations, a timeline for completion of all changes to EU P902 and a best available technology ("BAT") technical and cost effectiveness evaluation for applicable control systems for emissions unit P902 (Engineering Guide #89 may be used as the basis to determine the need for a BAT study).

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- (a) On or around January 12, 2017, the facility was to have submitted a revised and complete permit application for P902 that included a timeline for all changes, a BAT study and a cost effectiveness evaluation for control.
- (b) *Requested action:*

Within 30 days of the retest date but not later than May 1, 2017, Farm to Market Specialties shall submit a revised and complete permit application for P902 to Ohio EPA that includes a BAT study if determined necessary based on the results of the stack test.

Conclusion


The Ohio EPA requests that Farm to Market Specialties promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and regulations. Within 30 days of receipt of this letter, please provide, to Ohio EPA, the documentation requested above.

Failure to comply with Chapter 3704 of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, Farm to Market Specialties is requested to submit written correspondence describing the steps that will be taken by date certain to attain compliance.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Section 3704.06 of the Ohio Revised Code.

Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact me by phone at (419) 373-3128 or by email at Jeffrey.Skebba@epa.ohio.gov.

Sincerely,


Jeffrey Skebba
Environmental Specialist
Division of Air Pollution Control

/mrf

Certified Mail Receipt Number: 7016 3010 0000 4151 9743
7015 3010 0001 1938 1297

pc: DAPC-NWDO stack test file

ec: Paul Travis
Jay Liebrecht, DAPC-NWDO
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Jennifer Kellmermeier, DAPC-NWDO
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